

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CRYPTO ASSETS OPPORTUNITY FUND  
LLC and JOHNNY HONG, individually and on  
behalf of all others similarly situated,

Plaintiffs,

v.

BLOCK.ONE, BRENDAN BLUMER, DANIEL  
LARIMER, IAN GRIGG, and BROCK PIERCE,

Defendants.

Civ. No. 1:20-cv-3829

**STIPULATION AND [PROPOSED] ORDER**

Plaintiffs Crypto Assets Opportunity Fund LLC and Johnny Hong and Defendants Block.one and Daniel Larimer (the “Stipulating Defendants”), by and through their undersigned counsel, hereby stipulate and agree as follows:

WHEREAS, on May 18, 2020, plaintiffs filed a putative class action complaint (Dkt. No. 1) (“the Complaint”);

WHEREAS, plaintiffs and their counsel intend to seek appointment as lead plaintiffs and lead counsel, respectively, pursuant to the Private Securities Litigation Reform Act;

WHEREAS, the undersigned have conferred regarding issues of timing;

WHEREAS, plaintiffs and the Stipulating Defendants have not previously requested any extension of time in the litigation;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED subject to Court approval as follows:

1. Any deadlines for the Stipulating Defendants to answer, move to dismiss, or otherwise respond to the Complaint, to the extent such deadlines presently exist, are vacated, and Stipulating Defendants need not answer or otherwise respond to the Complaint; and

2. If plaintiffs and their counsel are appointed as lead plaintiffs and lead counsel, respectively, then plaintiffs shall have forty-five (45) days from the date of appointment to file an amended complaint; and

3. The Stipulating Defendants shall have forty-five (45) days from the filing of the amended complaint to answer, move to dismiss, or otherwise respond to any such amended complaint; and

4. If the Stipulating Defendants move to dismiss the amended class action complaint, the lead plaintiffs shall file any opposition to the motion to dismiss within thirty (30) days after the filing of the motion, and the Stipulating Defendants shall file any reply within thirty (30) days after the filing of the opposition to the motion to dismiss; and

5. The Stipulating Defendants do not waive any rights, remedies or other relief that they may seek, including to challenge jurisdiction or venue; and

6. Nothing in this stipulation shall prejudice the right of any party to seek further extensions on the consent of the other parties or from the Court.

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Dated: June 8, 2020

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Dated: June 8, 2020

*Attorneys for Plaintiffs*

SO ORDERED.

Dated: \_\_\_\_\_

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UNITED STATES DISTRICT JUDGE